

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

Richmond Division

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 3:23CR38-DJN
	)	
KEITH TRAVERS	)	

**STATEMENT OF FACTS**

The United States and defendant, KEITH TRAVERS, agree that the factual allegations contained in this Statement of Facts and in Count One of the Indictment in this case are true and correct, and that the United States could have proven them beyond a reasonable doubt.

1. On or about August 6, 2022, in the Eastern District of Virginia, and within the jurisdiction of this Court, defendant, KEITH TRAVERS (“Travers”), did knowingly and unlawfully take a motor vehicle that had been transported, shipped and received in interstate commerce from the person and presence of another by force and violence and by intimidation, with the intent to cause death and serious bodily injury, in violation of 18 U.S.C. § 2119.

2. On August 6, 2022, Travers and an accomplice met with the victim at Southside Plaza in Richmond, Virginia, purportedly to sell the victim a catalytic converter. However, Travers and his accomplice had driven to the meeting with no catalytic converters to sell. Once Travers opened the trunk of the vehicle and the victim realized there were no catalytic converters inside, the victim turned to leave. At this time, Travers’s accomplice began to pat the victim down. In response, the victim spun away and again attempted to leave. At that point, however, Travers’s accomplice stated, “you know what this is, give me your wallet, keys and

your phone.”

3. In response, the victim reached for the gun he was carrying on his right hip. As the victim was doing so, Travers pointed a gun at the victim’s head and exclaimed, “don’t lose your life over this.”

4. Fearing that Travers was about to shoot him, the victim turned his gun over to Travers’s accomplice, who racked it and then pointed it at the victim. The victim then handed his business wallet and car keys to Travers’s accomplice. There was between \$5,000-6,000 in the wallet when he handed it to Travers’s accomplice. The accomplice next demanded the victim turn over his phone. As both the accomplice and Travers were still pointing firearms at him, the victim handed the accomplice his work phone.

5. Travers’s accomplice then drove off in the victim’s car. Some personal equipment belonging to the victim was in the car at the time. The victim’s car, a Toyota Camry, was manufactured outside the Commonwealth of Virginia. Accordingly, it had been transported, shipped and received in interstate commerce prior to August 6, 2023.

6. Travers drove away in the car he and his accomplice had driven to the robbery scene.

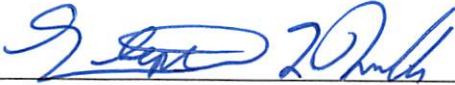
7. On August 19, 2022, officers of the Richmond Police Department arrested Travers for the carjacking after a lengthy and high-speed chase. Eventually, Travers abandoned his car and fled on foot. As the officers were closing in on him, Travers threw a Taurus, model G2e 9mm semi-automatic pistol, serial number ADB004798, under a nearby vehicle. The gun is the same firearm Travers used during the carjacking on August 6, 2022.

8. Defendant committed the offense charged in Count One of the indictment knowingly and unlawfully and not as a result of mistake or accident.

Respectfully submitted,

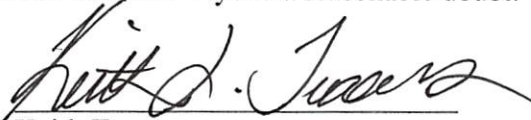
JESSICA D. ABER  
UNITED STATES ATTORNEY

By:

  
Stephen W. Miller  
Assistant United States Attorney


I have consulted with my attorney regarding this Statement of Facts. I knowingly and voluntarily agree that each of the above-recited facts is true and correct and that had this matter gone to trial the United States could have proven each one beyond a reasonable doubt.

10/23/23  
Date

  
Keith Travers

I am counsel for defendant, KEITH TRAVERS. I have carefully reviewed this Statement of Facts with him and, to my knowledge, his decision to agree to this Statement of Facts is an informed and voluntary decision.

10/23/23  
Date

  
Joseph Camden  
Counsel for Defendant